

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Mailing Online Service)

Docket No. MC98-1

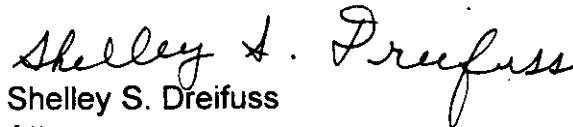
OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: CHONG BUM LIM
(OCA/USPS-ST9-11-12)
(January 26, 1999)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,



Gail Willette
Acting Director
Office of the Consumer Advocate



Shelley S. Dreifuss
Attorney



OCA/USPS-ST9-11. Please refer to your testimony at page 4 and 5, lines 25-26 and 1-3, respectively.

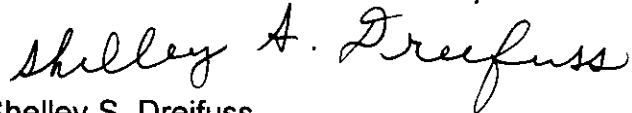
- a. Please confirm that time is an important element of costs of the Mailing Online help desk. If you do not confirm, please explain.
- b. Please explain the rationale for excluding the duration of calls received by the Mailing Online help desk as an element of the "cost driver" for Mailing Online help desk costs.
- c. Please confirm that the number and duration of calls to the Mailing Online help desk should form the "cost driver" for the Mailing Online help desk. If you do not confirm, please explain.

OCA/USPS-ST9-12. Please refer to your testimony at page 10, lines 10-13, where it states that "MOL users . . . are therefore assumed to cause personnel, hardware, and software costs," and Exhibit E, "MOL/POL Help Desk."

- a. In Exhibit E, please identify the hardware costs of the MOL/POL help desk.
- b. Please confirm that there are telecommunication costs associated with the MOL/POL help desk. If you do not confirm, please explain.
- c. Please list the "personnel, hardware, and software costs," and the associated amounts, of the MOL/POL help desk that
 - (i) are affected by the duration of calls to the Mailing Online help desk; and,
 - (ii) are not affected by the duration of calls to the Mailing Online help desk.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in cursive script that reads "Shelley S. Dreifuss".

Shelley S. Dreifuss
Attorney

Washington, D.C. 20268-0001
January 26, 1999